



Passing the CTE Federal Program Monitoring “FPM”

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Workshop Objectives

1. Review CTE Monitoring Instrument
2. What is a finding?
3. How to stay ahead of the game



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What is your role in the FPM?



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CTE MONITORING INSTRUMENT



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The Instrument is determined by the following:

- Perkins Career Technical Education Act of 2006
- 2008–12 State Plan for CTE
- EDGAR (Education Department General Administration Regulations)
- OMB Circulars (Office of Management and Budget)
 - Circular A-87 Cost Principals – State and Local
 - Circular A-133 Single Audit Requirements



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Purpose of the Funds

Section 135(a) of Perkins IV states,

“Each eligible recipient (LEA) of the Section 131 and 132 funds shall use these funds to **improve** CTE programs.”

AVA Audit Handbook Chapter 4

While the regulations do not provide a definition of “program improvement,” it is clear that the **funds may not be used to simply maintain the status quo.**



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To Improve CTE Programs

The CDE has interpreted this to mean that funds may only be used to support activities intended to:

- **IMPROVE:** modify or update existing programs
- **ENHANCE:** the effectiveness of existing programs
- **EXPAND:** develop and implement new programs or provide additional offerings



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Basic Criteria for Expending the Funds

- Expenditures Must:
 - Meet the purpose of the Act
 - Be necessary and reasonable
- Expenditures May Not be Used for:
 - General purposes
 - Maintenance of existing programs



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Are the following examples supplanting?

Buying printer paper for the whole CTE
Department office printer?

Buying a breeding pig for the Animal Science
program?

Buying 5 ink cartridges for the CAD class,
split funded – 3 to LCAP, 2 to Perkins?

Buying a smart board for all the CTE
teachers just like everyone else on campus?



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Supplement, Not Supplant !!

- Cannot use Federal Funds to pay for Services, Staff, Programs, or Materials that would otherwise be paid with State or Local Funds
- Always ask:

“What would have happened in the absence of federal funds?”



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Items vs Evidence

- Evidence is what the LEA provides to the CDE to support compliance
- Items are what findings are based on related to the regulations related to the funding source



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CTE Monitoring Instrument

1. How many major item indicators are in the CTE Instrument?
2. How many minor items in CTE 09?
3. Which item does not apply to all LEA's?
4. Which item can only be checked off during the site review?



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5. Which items use the General Ledger as evidence of compliance?

6. Why did CDE ask for CTE Teacher Credentials in the application this year?

7. What can count as evidence of Professional Development?

8. What evidence item requests student names to be redacted?

9. When do invoices get uploaded?



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What is a finding?



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A finding is a.....

- 1) Brief statement of the portion of the legal requirement the LEA has not met,
- 2) Identification of the evidence reviewed that was the basis of the conclusion, and
- 3) Indicates what the agency must demonstrate in order to resolve the finding.



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When does the finding need to be cleared?

Stage 1 – 45 calendar days

You may ask for an extension.

Stage 2 – 225 calendar days

No further extensions.



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How to stay ahead of the game

- Start early!!!
- Backwards plan!!!



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Plan Backward

- 1) FPM Entrance Meeting, Review, Exit Meeting
- 2) 30 Day Cutoff for uploading evidence
- 3) Meet with Perkins Consultant to discuss review items, etc.
- 4) Delegate evidence verification and collection
- 5) Attend FPM training



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Delegating Evidence Collection

Examples:

- Inventory verification*
- General Ledger
- Personnel Activity Reports (PARs) including Substitute Charges
- Course Outlines
- Master Schedules
- Perkins Course Sequence Worksheets

* Most common reason for findings



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Most Common Findings

- **CTE 01 – CTE Advisory Board**
 - no minutes, no board members, only district staff
- **CTE 02 – Funding Applications**
 - no grant documents available upon request
- **CTE 03 – Inventory**
 - missing, wrong location, does not exist
- **CTE 04 – CTE Programs**
 - no signed articulations agreements
 - non-allowable charges to Perkins by LEA



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Most Common Findings (cont.)

- **CTE 05 – Supplement not Supplant**
 - missing PARs, supplanting purchases, missing invoices
- **CTE 08 – Indicators of Performance**
 - Perkins indicators not available to the public
- **CTE 09 – High Quality CTE Program**
 - Non-CTE credentialed teachers, no industry certifications, no student leadership development, no coherent sequence of courses



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Common Coordinator Mistakes

- Not being prepared
- Not informing site management of visit dates and times
- Not making sure all inventory is **ON** campus and ready for verification
- Not communicating with the FPM reviewer – emails, phone calls, in person
- Trying to hide non-compliance with upload overload



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How to have a great review

- Be open and honest, some things can't be fixed during the review
- If visiting multiple sites, have site inventories and master schedule on hand at each site
- Communicate, communicate, communicate
- Be flexible and ask your site staff to be the same
- Relax, hydrate, and be prepared to show off your programs



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**THANK
YOU**